CalRecycle Packaging Reform Workshop

October 10, 2017

For Remote Participants:

- Please send all questions, comments, or technical issues via e-mail to: packaging@calrecycle.ca.gov

- The live video stream (webcast) is available at: http://www.calrecycle.ca.gov/Broadcast/

- A recording of the webcast will be posted on CalRecycle's website: http://www.calrecycle.ca.gov/ReduceWaste/Packaging/Events/default.htm

Opening Remarks

Scott Smithline
Director, CalRecycle

Howard Levenson
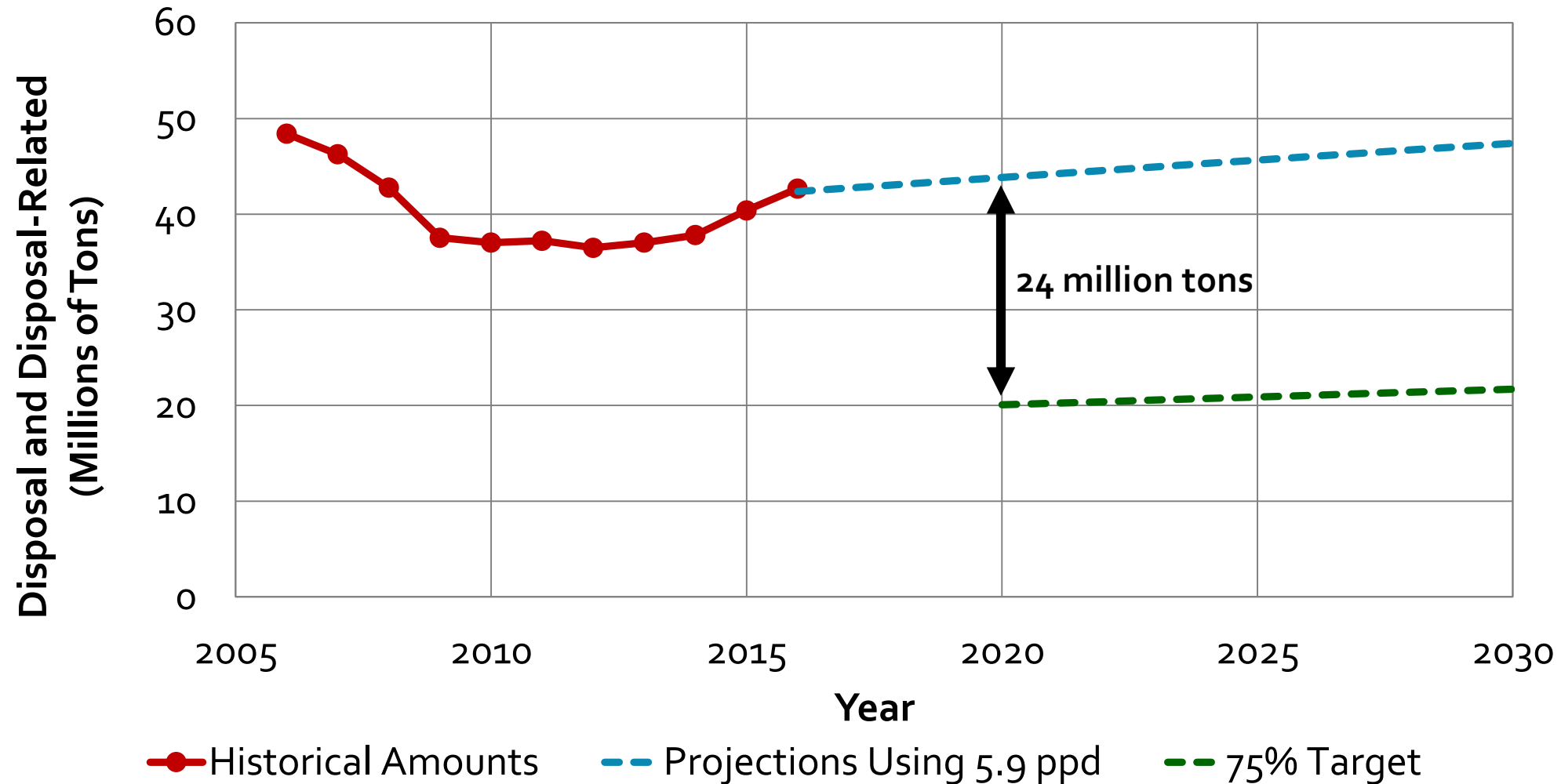Deputy Director, Materials Management and
Local Assistance Division

Staff Presentation:
Approaches for Managing Packaging

Karen Morrison
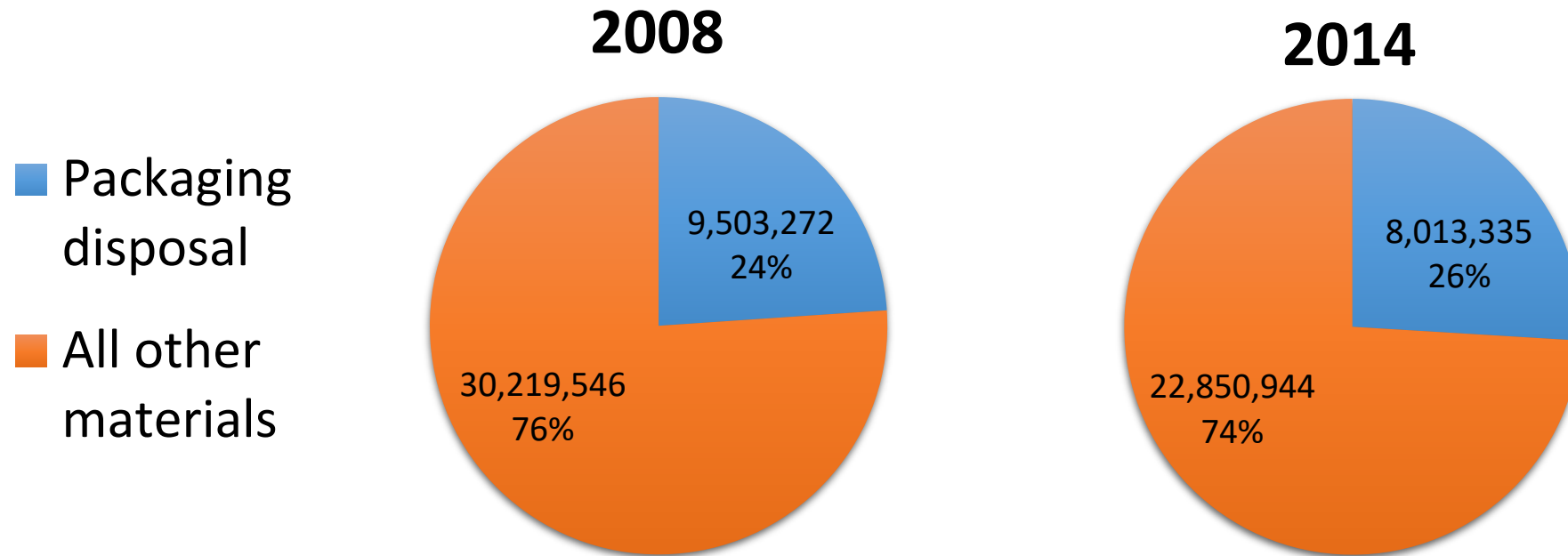Senior Environmental Scientist
Policy Development and Analysis

Packaging Reform
Policy Model Development Process

- What is CalRecycle doing and why?

- What are the goals of today's workshop?

- What are the next steps?

Statewide Projected Disposal Rate

Historical Amounts • **Projections Using 5.9 ppd** • • **75% Target**

Packaging in California's Disposal Stream (tons)

2008

Packaging disposal (blue): 9,503,272 — 24%

All other materials (orange): 30,219,546 — 76%

2014

Packaging disposal (blue): 8,013,335 — 26%
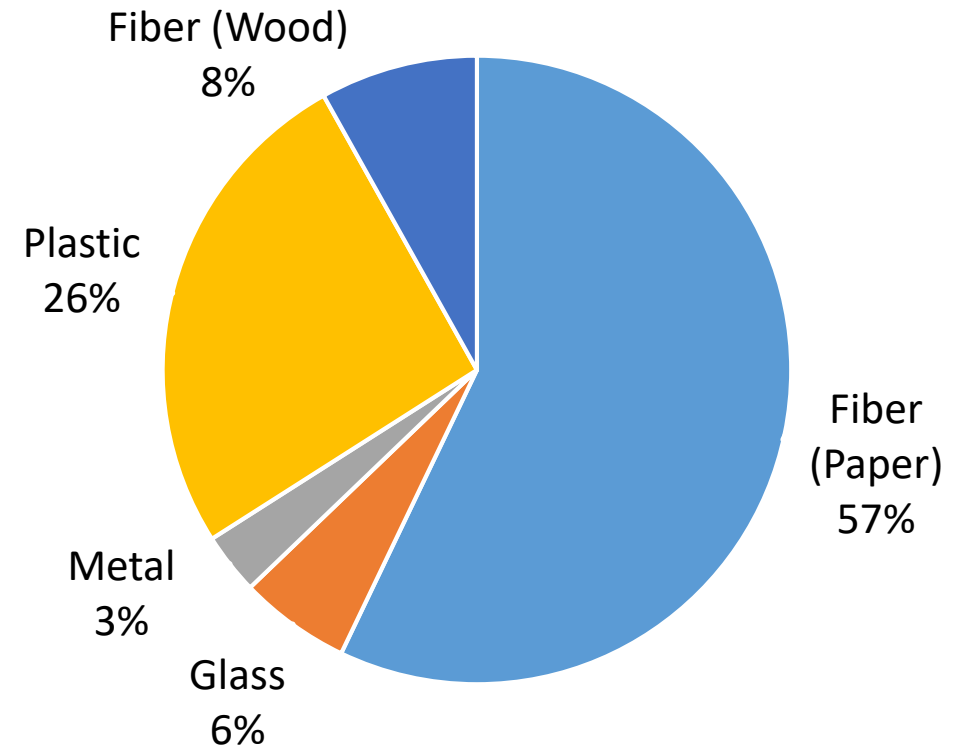
All other materials (orange): 22,850,944 — 74%

Based on data from CalRecycle 2008 & 2014 waste characterization studies

Packaging Material Types Disposed

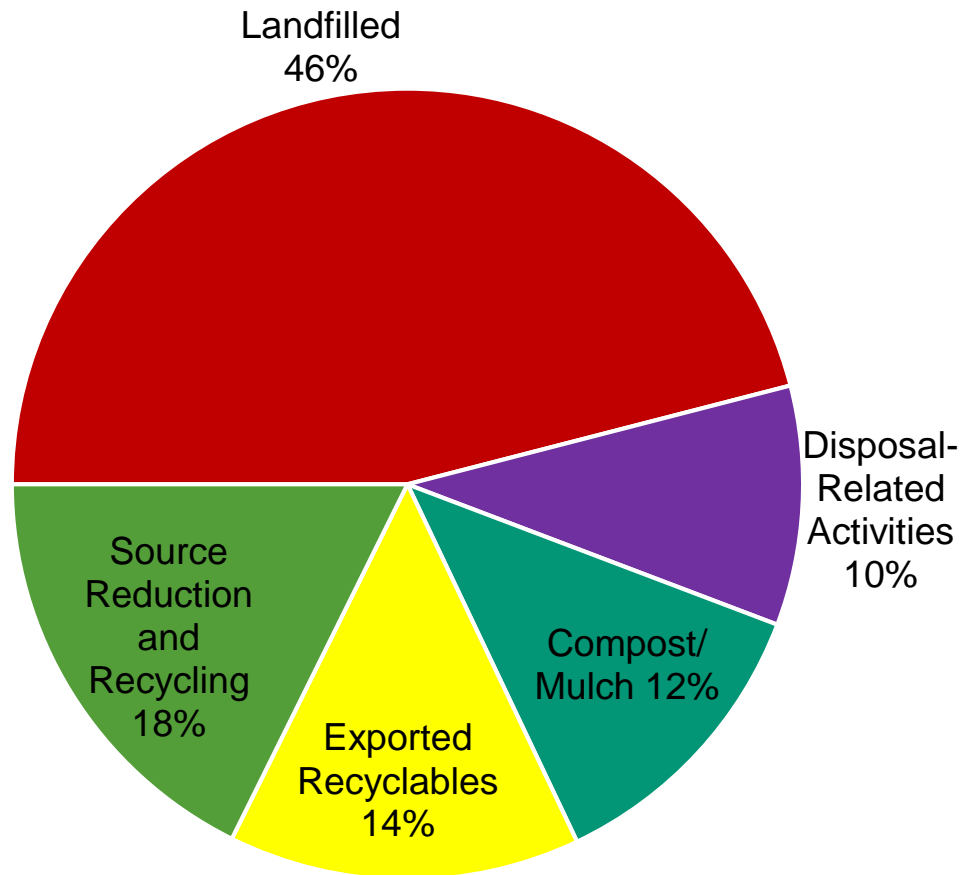Most prominent packaging
material types:

- Fiber (paper) – 5.1 million tons
- Plastic –2.3 million tons

Fiber (Wood) 8%

Plastic 26%

Metal 3%

Glass 6%

Fiber (Paper) 57%

Based on data from CalRecycle 2008 & 2014 waste characterization studies

Export Market and China's Import Ban

Landfilled 46%

Source Reduction and Recycling 18%

Exported Recyclables 14%

Compost/Mulch 12%

Disposal-Related Activities 10%

Estimated 76.5 million tons generated – AB 341

- Roughly 1/6 of all waste generated in CA is exported
- Export markets have declined significantly
- Recent changes to China's import policies will likely impact CA recycling

CalRecycle's Goals for Packaging Reform

- Divert a significant amount of packaging from landfill

- Promote source reduction, recycling, and higher uses of packaging

- Address other environmental impacts of discarded packaging (GHG, marine debris, etc.)

- Develop in-state and in-country infrastructure to manage post-consumer packaging

CalRecycle's Packaging Activities
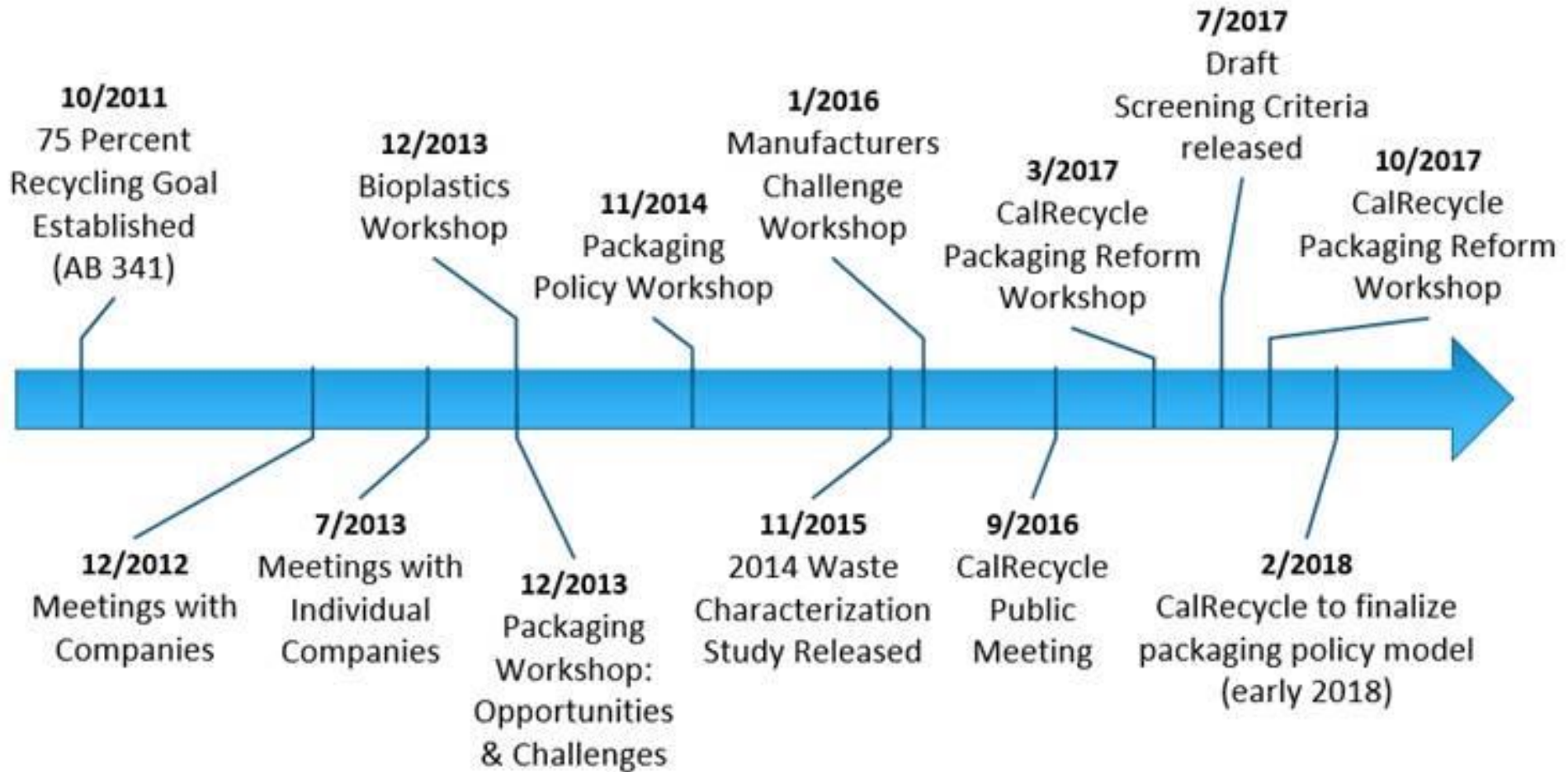
What does a mandatory, comprehensive policy mean?

- Strategy to manage all packaging in California

- Includes enforceable metrics and goals

- Manage significant amounts of material currently going to landfills

- Authority to identify priority products and implement appropriate tools
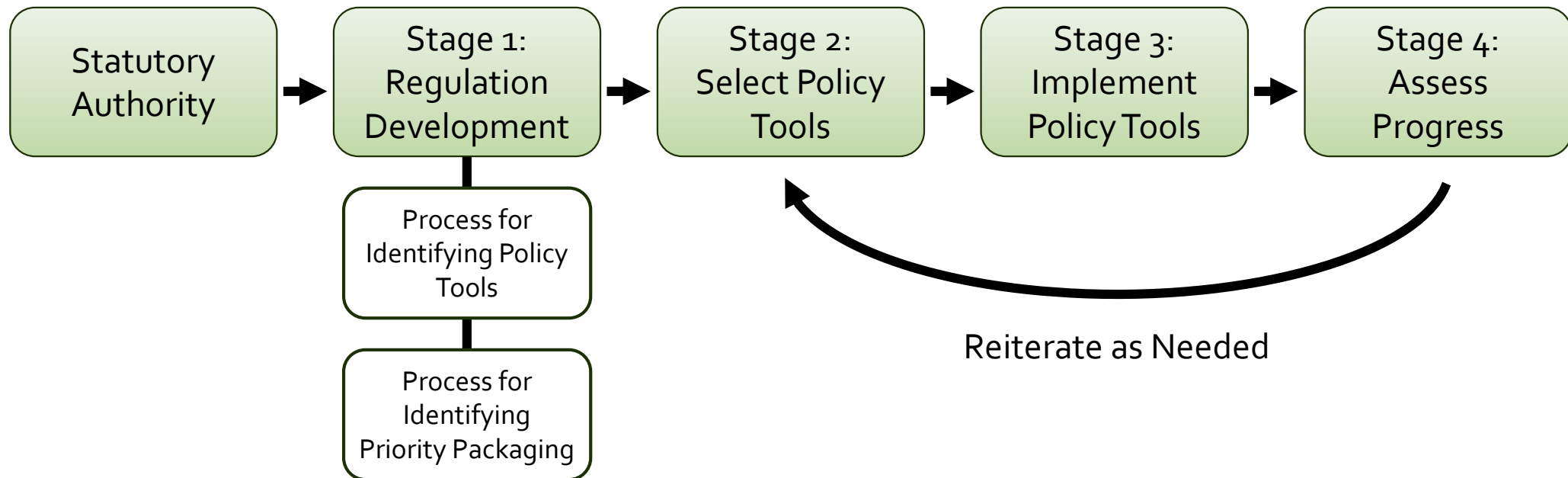
What is included in packaging?

- All packaging material types, unless otherwise specified, that are placed into the California market

- Primary, secondary, and tertiary packaging

CalRecycle's Essential Components for a Statewide Policy for Packaging

- Comprehensive

- Flexible

- Consistent process

- Transparent with robust public participation

- Specific and enforceable goals and metrics

- Recognizes prior innovations and efforts

- Addresses pre- and post-consumer life of packaging

Statewide Packaging Framework

Statutory Authority → Stage 1: Regulation Development → Stage 2: Select Policy Tools → Stage 3: Implement Policy Tools → Stage 4: Assess Progress

Process for Identifying Policy Tools

Process for Identifying Priority Packaging

Reiterate as Needed

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Stage 1A: Identifying Policy Tools

1. Source Reduction
2. Labeling Requirements
3. Recyclable/Compostable Design
4. Standard List of Recyclable/ Compostable Packaging
5. Minimum Postconsumer Recycled Content
6. Producer Responsibility

7. Landfill Ban
8. Deposit System
9. Increasing Landfill Tipping Fee
10. Packaging Product Sales Ban
11. Pay-As-You-Throw
12. Advanced Recycling Fees
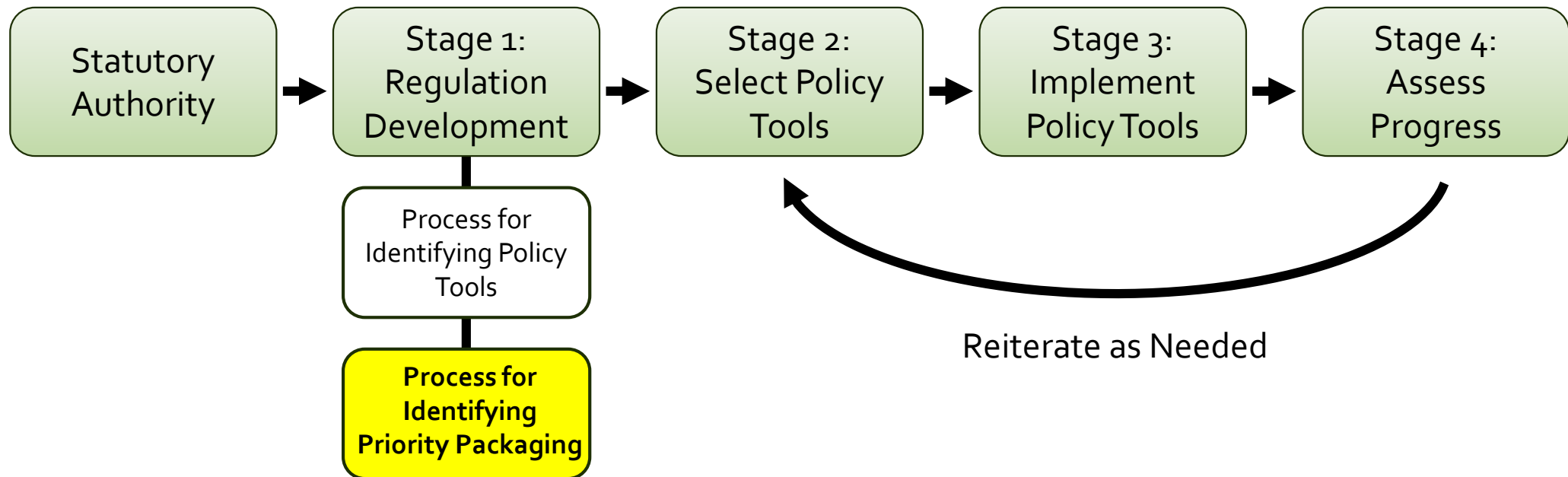13. Materials Management Fees

Summary of Policy Tools

- Variation in complexity

- Variation in likely impact

- Variation in utility as a stand-alone tool

- Variation in effectiveness based on packaging type

There is no single tool that will manage all packaging.

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Process for Identifying Policy Tools

Process for Identifying Priority Packaging

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Stage 1B: Identifying Priority Packaging

Draft Screening Criteria

- Solicited stakeholder feedback in July and August on nine draft screening criteria

- Received 26 comment letters

- Nine new criteria were suggested

Draft Screening Criteria Response

- Clarified and condensed screening criteria into six categories

- Incorporated other feedback into analysis of policy tools and pairing of tools with packaging, rather than for screening

Stage 1B: Identifying Priority Packaging

Screening Criteria

1. Prevalence in Disposed Waste Stream

2. Usage Trends

3. Current Collection Infrastructure

4. Current Processing Infrastructure

5. Greenhouse Gas Impacts of Recycling

6. Waterway and Marine Debris

Stage 1B: Identifying Priority Packaging

Example application of screening criteria to three plastic categories:

	Film plastic	PET containers	HDPE containers
1. Prevalence in Disposed Waste Stream	1	0	-1
2. Usage Trends	1	1	1
3. Current Collection Infrastructure	1	-1	-1
4. Current Processing Infrastructure	1	-1	-1
5. Greenhouse Gas Impacts of Recycling	0	0	-1
6. Waterway and Marine Debris	1	0	-1
Final Prioritization	**5**	**-1**	**-4**

For individual criteria, priority is assigned as 1 (high), 0 (medium), or -1 (low).
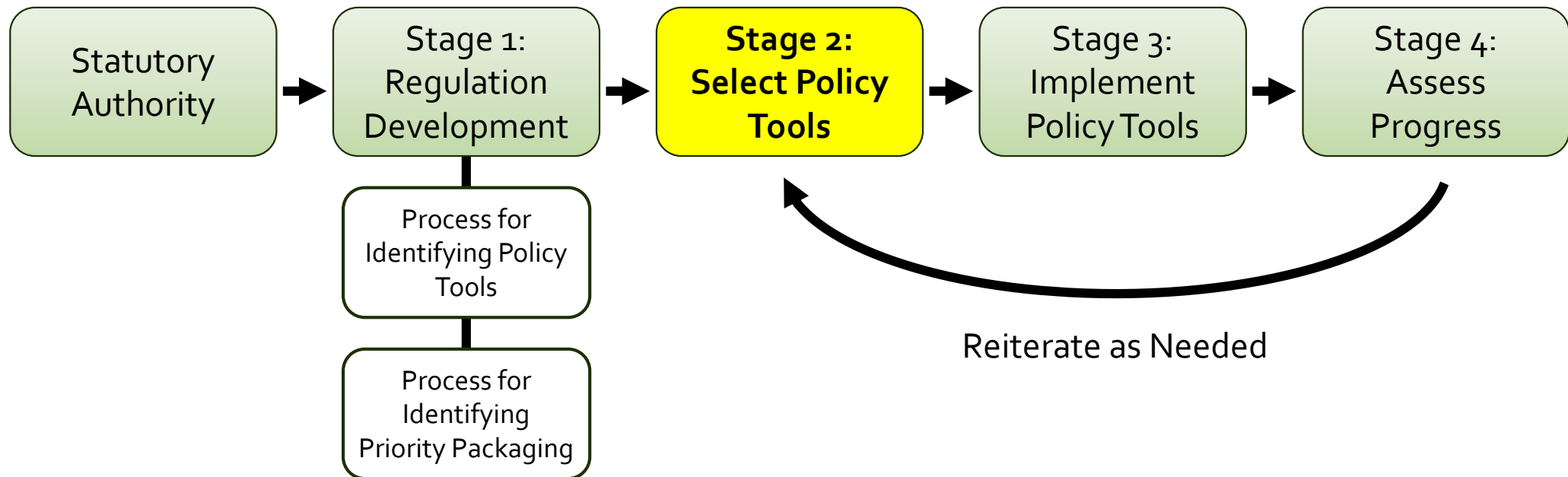
Summary of Priority Packaging

Fibers

- Uncoated corrugated cardboard

- Waxed cardboard

- Aseptic containers and cartons

Plastics

- Film Plastic

- Expanded Polystyrene

- Pouches

Statewide Packaging Framework

Statutory Authority → Stage 1: Regulation Development → **Stage 2: Select Policy Tools** → Stage 3: Implement Policy Tools → Stage 4: Assess Progress

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Stage 2: Selection of Policy Tools

Tools for All Packaging

Identified 8 tools that could apply to all packaging:

- Source reduction
- Producer responsibility
- Pay as you throw
- Landfill tipping fee

- Advanced recycling fee
- Statewide list of recyclables
- Recyclable or compostable design
- Labeling requirements

Stage 2: Selection of Policy Tools

Tools for All Packaging

- Take advantage of economies of scale

- Allow for consistent education and material management

- Can provide broad funding to support efforts

- Provide benefits to a range of products

Stage 2: Selection of Policy Tools

Tools for Specific Packaging

- Allows for specific challenges to be addressed

- For example, different recyclability for UCC versus waxed cardboard, and the high volumes of UCC

- For example, the gap between recycling collection and market development for cartons

- For example, the difficult in separating multiple material layers in pouches for recycling

Stage 2: Selection of Policy Tools

Example – Film Plastic

- Challenges:
  - Economics of collection and transport can be limiting
  - Food packaging can result in contamination
  - Curbside collection leads to contamination and damage to MRFs
  - Wide variety of materials

Stage 2: Selection of Policy Tools
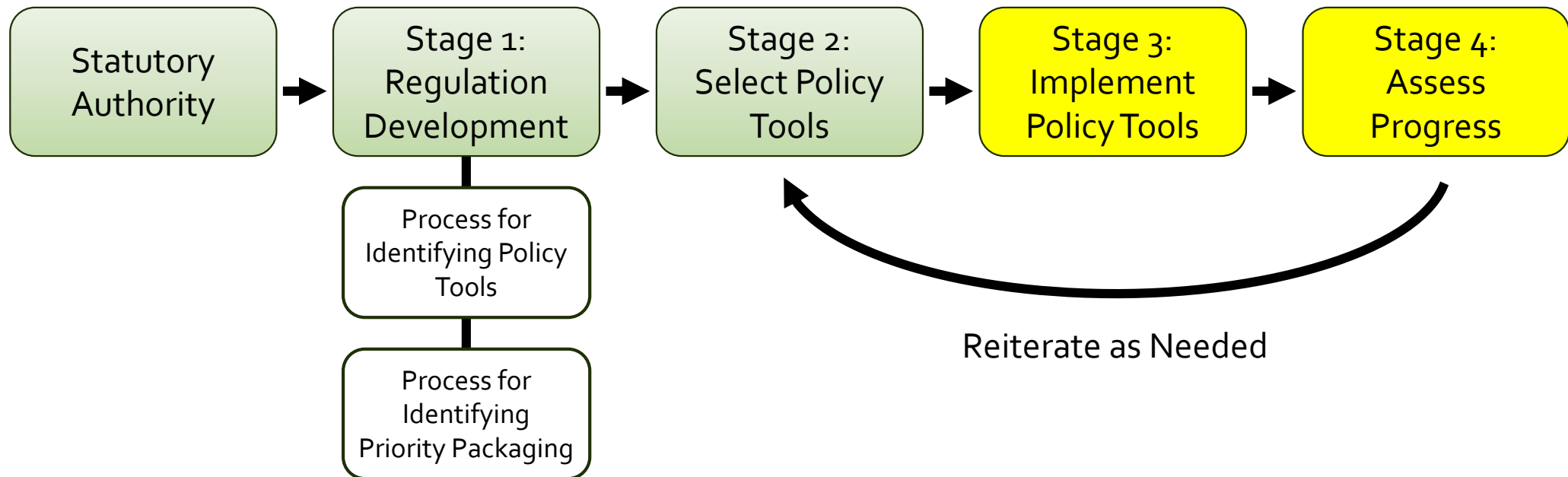
Example – Film Plastic

- Opportunities to ensure cleaner material and manage collection:

  - Establish stable funding sources (advanced recycling fees, PAYT, increased landfill tipping fees, or EPR)

  - Minimize generation (source reduction)

  - Ensure clean streams (source separation)

  - Establish consequences (labeling requirements for "not recyclable in California")
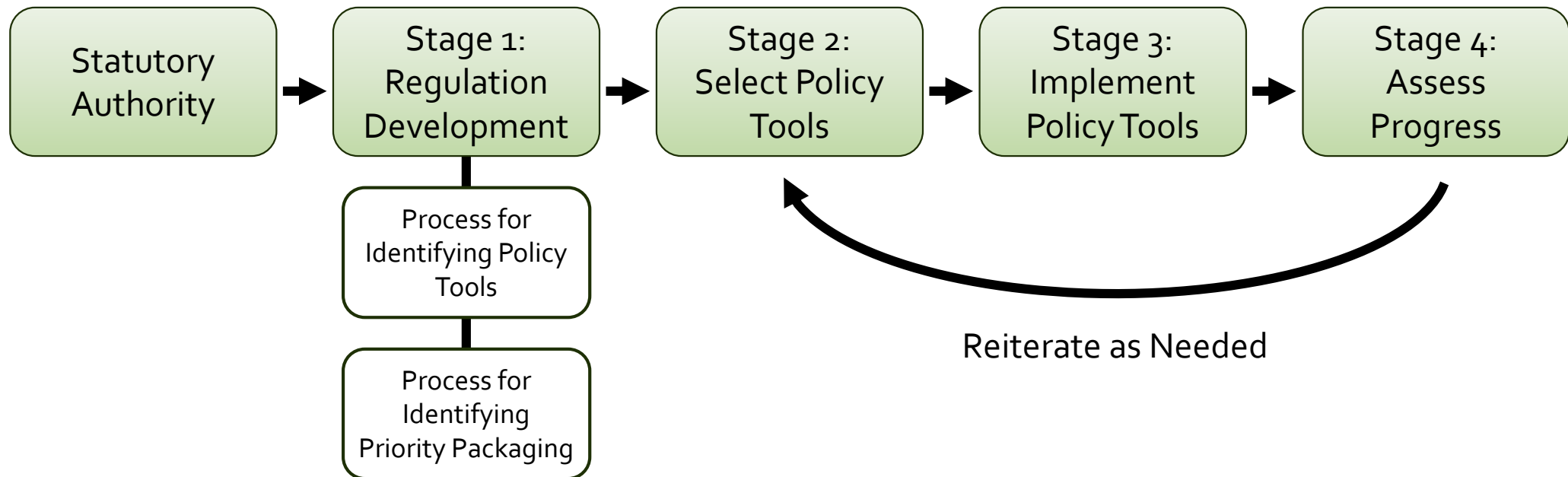
Stage 2: Selection of Policy Tools

Examples of Tools for Specific Packaging

- **Uncoated Corrugated Cardboard:** Source reduction, PAYT, increased tipping fees, minimum content requirements

- **Waxed Cardboard:** Mandating recyclable or compostable design, source reduction

- **Aseptic Containers and Cartons:** Deposit systems, labeling

- **Expanded Polystyrene:** EPR, labeling, sales ban

- **Pouches:** Advanced recycling fees, minimum content requirements, labeling requirements

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General Discussion

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Discussion on Stage 1:
Policy Tools and Priority Packaging

- Are there any policy tools that should be included in a packaging management strategy that were not listed?

- Are there other pros or cons for individual policy tools that should be considered?

- In the context of a broader packaging framework, are there any additional screening criteria that should be added, and if so, what data should be used to evaluate that criterion?

- Should certain criteria be prioritized in determining priority packaging?

- Are there other data sources the Department should consider?

Discussion on Stage 2:
Pairing Policy Tools with Packaging

- Staff proposed 8 tools that could be applied to all packaging.

  - Are there other policy tools identified in Stage 1 that could be applied to all packaging?

  - Are there tools that should not be applied to all packaging?

- Staff identified 6 priority packaging types.

  - Are there other barriers or challenges that should be addressed?

  - Are there policy tools that should or should not be considered?

Stakeholder Feedback on Stage 3: Implementing Policy Tools

- How could the Department recognize previous investments by companies to optimize packaging or divert it from landfills to higher and better uses?

- How should changes in the marketplace be incorporated into a packaging framework?

  - For example, how would changes in scrap prices for materials be reflected in priority packaging or program goals?

Stakeholder Feedback on Stage 4: Assessing Progress

- In a framework approach, specific metrics and enforceable goals would be established as a part of the public process. How might progress and success be measured?
  - For example, 50% reduction in packaging in disposed waste.
  - For example, XX fewer units of a specific packaging type.
  - For example, YY% of containers must be reusable.

General Discussion

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Next Steps

- Invite written comments through Tuesday, October 31. Please send to packaging@calrecycle.ca.gov.

- Welcome individual meetings through December 1, 2017 to discuss recommendations. Please coordinate through packaging@calrecycle.ca.gov.

- Formal recommendation presented in early 2018.